

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Oct 21, 2020

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.


CORA MAE DANLEY,

Defendants.

4:20-CR-6031-SMJ-4

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(i), 846
Conspiracy to Distribute 100
Grams or More of Heroin
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of Fentanyl
(Counts 2-4)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(i)
Possession with Intent to
Distribute Heroin
(Count 5)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Possession with Intent to
Distribute Fentanyl
(Count 6)

21 U.S.C. § 853
Forfeiture Allegations

1
2 The Grand Jury charges:

3
4 COUNT 1

5 Beginning on or about a date unknown, but at least by on or about January 1,
6 2020, and continuing until on or about October 20, 2020, in the Eastern District of
7 Washington, and elsewhere, the Defendants, [REDACTED],
8 [REDACTED], [REDACTED], and CORA MAE DANLEY,
9
10 knowingly and intentionally combined, conspired, confederated and agreed
11 together and with other persons, both known and unknown, to commit the
12 following offense: distribution of 100 grams or more of a mixture or substance
13 containing a detectable amount of heroin, a Schedule I controlled substance, in
14 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(i); all in violation of 21 U.S.C. § 846.
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18 COUNT 2

19 On or about March 5, 2020, in the Eastern District of Washington, the
20 Defendant, [REDACTED], did knowingly and intentionally
21 distribute a mixture or substance containing a detectable amount of N-phenyl-N-
22 [1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled
23 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).
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COUNT 3

On or about March 19, 2020, in the Eastern District of Washington, the Defendants, [REDACTED] and [REDACTED], did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 4

On or about April 2, 2020, in the Eastern District of Washington, the Defendants, [REDACTED] and [REDACTED], did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 5

On or about May 13, 2020, in the Eastern District of Washington, the Defendants, [REDACTED] and CORA MAE DANLEY, did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(i).

COUNT 6

On or about May 13, 2020, in the Eastern District of Washington, the Defendants, [REDACTED] and CORA MAE DANLEY, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841(a)(1) as alleged in Counts 1-6 of this Indictment, the Defendants, [REDACTED], [REDACTED], [REDACTED], and CORA MAE DANLEY, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

1 If any forfeitable property, as a result of any act or omission of the
2 Defendant(s):
3

- 4 (a) cannot be located upon the exercise of due diligence;
5 (b) has been transferred or sold to, or deposited with, a third party;
6 (c) has been placed beyond the jurisdiction of the court;
7 (d) has been substantially diminished in value; or
8 (e) has been commingled with other property which cannot be divided
9 without difficulty;

10 the United States of America shall be entitled to forfeiture of substitute property
11 pursuant to 21 U.S.C. § 853(p).
12

13 DATED this ____ day of October, 2020.
14

15 A TRUE BILL
16

17 _____
18 Foreperson
19

20 _____
21 William D. Hyslop
22 United States Attorney
23

24 _____
25 Benjamin D. Seal
26 Assistant United States Attorney
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